

AO 91 (Rev. 08/09) Criminal Complaint

Special Agent : Dustin Hurt

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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.
Charmaine L. Prince

Case: 4:21-mj-30131
Unassigned
Assign. Date :3/15/2021
SEALED MATTER

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of January 22, 2021, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in possession of a firearm

This criminal complaint is based on these facts:
Please see the attached affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Dustin Hurt, Special Agent - ATF&E
Printed name and title

Sworn to before me and signed in my presence.

Date: March 15, 2021


Judge's signature

City and state: Flint, Michigan

Curtis Ivy, Jr., United States Magistrate Judge
Printed name and title

AFFIDAVIT

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since October of 2018. I am currently assigned to the Detroit Field Division, Flint Field Office. Before working for the ATF, I was employed by the Michigan Department of State Police (MSP) for approximately seven years. Before working for MSP, I was a local police officer for the Grand Ledge Police Department for approximately three years. I held numerous positions with the MSP, including Detective Sergeant in the Polygraph Unit and Task Force Officer with the FBI. During my employment with ATF and MSP, I have conducted or participated in numerous criminal investigations focused on firearms, armed drug trafficking, and criminal street gangs, and other violations of federal law.

2. I make this affidavit from personal knowledge based on my participation in this investigation, my review of reports and other materials prepared by those who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

Probable Cause

3. On January 22, 2021, a customer at the Marathon Gas Station, located at 4508 Fenton Road in Flint within the Eastern District of Michigan, called 911 and reported an argument between a woman and a man with a pistol in his waistband. The 911 caller described the person (a black male wearing a gray hoodie and black pants) with the gun and updated central dispatch as the man walked eastbound into the parking lot of another business on Fenton Road. Officers from the Flint Township Police Department, and other police agencies, responded to the call. During an interview with an officer later, the 911 caller said that she heard the man scream at the woman that he was going to kill her and he should with the gun he had, as he was throwing things around. The 911 caller reported that the woman was screaming that he had a gun. But the 911 caller clarified during the interview that she did not actually see a gun.

4. Grand Blanc Police Department officers arrived at the area and saw a man matching the description who was wearing a gray hoodie and black pants. An officer approached the man, later identified as Charmaine Latrell Prince (DOB: xx/xx/1986), and asked him whether he had a gun. Prince responded that he did and it was in his right back pocket. The officer asked Prince whether he had a license to carry a concealed pistol. Prince replied, "No." The officer then placed

Prince under arrest and found an unloaded pistol inside Prince's pocket incident to his arrest.

5. A Flint Township police officer later took possession of the firearm. The firearm was a Heckler & Koch, model P30SK, 9mm semi-automatic pistol with the serial numbers completely obliterated. An officer queried Prince in the Law Enforcement Information Network (LEIN) and learned that he did not have a license to carry a concealed pistol and he had an outstanding warrant for his arrest.

6. A Flint Township officer read Prince his *Miranda* rights and Prince affirmed that he wished to speak to the officer about the incident. Prince explained that the firearm belongs to his girlfriend and he took it from her because she is crazy. Prince added that his girlfriend owned the firearm before they started dating. During his transport to the Genesee County Jail, Prince became enraged and yelled that he never even got a chance to shoot the firearm before it was taken from him.

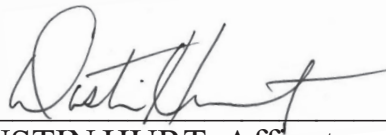
7. On March 12, 2021, ATF Special Agent Kyle Salcido, who is recognized by ATF as having expertise in the interstate travel and manufacture of firearms, conducted an interstate nexus determination. SA Salcido concluded that the Heckler & Koch, model P30SK, 9mm semi-automatic pistol meets the federal definition for a firearm under 18 U.S.C. § 921(a)(3) and was manufactured in Germany. This firearm therefore traveled through interstate or foreign commerce

before Prince possessed it.

8. I have reviewed Prince's criminal history records. On June 29, 2010, in the 7th Circuit Court in Flint, Michigan, the court sentenced Prince to serve 51 months to 15 years in the Michigan Department of Corrections for an armed robbery conviction in case 10-026394-FC. Because of this conviction and sentence, there is probable cause to believe that Prince was convicted of a felony punishable by a term of imprisonment exceeding one year and he knew this when he possessed a firearm on January 22, 2021.

Conclusion

9. Based on the foregoing, I have probable cause to believe that on January 22, 2021, in the Eastern District of Michigan, Charmaine Prince, knowing that he had been convicted of a felony offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm in violation of 18 U.S.C. § 922(g)(1).



DUSTIN HURT, Affiant
Special Agent
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means
on March 15, 2021.



HON. CURTIS IVY, JR.
United States Magistrate Judge